

## Appendix B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
Houston DIVISION

See page 1 (The Plaintiff)

version

CIVIL ACTION NO. \_\_\_\_\_

See pages 1-2  
(The defendants)

ORIGINAL COMPLAINT

See pages 3-4 (The Complaint)

**The Plaintiff is:**

1. Robert D. Bowers: P.O. Box 2103, Philadelphia, PA 19103, 347-875-7202

**The defendants are:**

1. ConocoPhillips Company: 600 N. Dairy Ashford Rd., Houston, TX 77079, 281-293-1000
2. Marathon Oil Corporation: 5555 San Felipe Street, Houston, TX 77056, 713-629-6600
3. Enterprise Products Partners L.P.: 1100 Louisiana St., Houston, TX 77002, 713-381-6500
4. Sysco Corporation: 1390 Enclave Pkwy., Houston, TX 77077, 281-584-1390
5. Plains All American Pipeline: 333 Clay St., Houston, TX 77002, 713-646-4100
6. Halliburton Co.: 3000 N. Sam Houston Pkwy E., Houston, TX 77032, 281-871-2699
7. Baker Hughes Incorporated: 2929 Allen Pkwy., Houston, TX 77019, 713-439-8600
8. Apache Corporation: 2000 Post Oak Blvd., Houston, TX 77056, 713-296-6000
9. National Oilwell Varco: 7909 Parkwood Circle Dr., Houston, TX 77036, 713-375-3700
10. Waste Management Incorporated: 1001 Fannin St., Houston, TX 77002, 713-512-6200
11. EOG Resources Incorporated: 1111 Bagby St., Houston, TX 77002, 713-651-7000
12. KBR Incorporated: 601 Jefferson St., Houston, TX 77002, 713-753-3011
13. Enbridge Incorporated: 1100 Louisiana St., Houston, TX 77002, 713-821-2000
14. CenterPoint Energy: 1111 Louisiana St., Houston, TX 77002, 713-207-1111
15. Kinder Morgan Incorporated: 500 Dallas St., Houston, TX 77002, 713-369-9000
16. Targa Resources: 1000 Louisiana St., Houston, TX 77002, 713-584-1000
17. Cameron International Corp.: 1333 W. Loop S., Houston, TX 77027, 713-513-3300
18. Calpine Corporation: 717 Texas Ave., Houston, TX 77002, 713-830-2000
19. Group 1 Automotive Incorporated: 800 Gessner Rd., Houston, TX 77024, 713-647-5700
20. Spectra Energy Corporation: 5400 Westheimer Court, Houston, TX 77056, 713-627-5400

21. FMC Technologies Incorporated: 1803 Gears Rd., Houston, TX 77067, 281-591-4000

22. El Paso Corporation: 1001 Louisiana St., Houston, TX 77002, 713-420-2600

23. Frontier Oil: 10000 Memorial Dr., Houston, TX 77024, 713-688-9600

**The Complaint:**

1. This action is brought under the Ninth Amendment to the United States Constitution, which is part of the Bill of Rights, addresses rights of the people that are not specifically enumerated in the Constitution.
2. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5(f)(2)(e).
3. Title VII of the Civil Rights Act of 1964 for employment discrimination protects from discrimination on grounds of educational institution under the Ninth Amendment.
4. Because of the plaintiff's educational institution, Jesse H. Jones School of Business at Texas Southern University, the defendants have failed to recruit and employ the plaintiff.
5. Between January-2010 through May-2013 the defendants have discriminated against the plaintiff by exhibiting hiring practices that exclude on-campus recruiting at Texas Southern University.
6. The defendants recruit and employ students that have an education from "Top Tier" universities, which is a discriminatory practice against students and job applicants that have an education from Texas Southern University.
7. The plaintiff requests that the defendants be ordered to stop discriminating on grounds such as educational institution; to recruit on-campus at Texas Southern University; and that; the Court grant other relief, including injunctions, punitive damages, costs and attorney's fees.
8. The defendants: ConocoPhillips, Marathon Oil, Sysco, Enterprise Product Partners, Plains All American Pipeline, Halliburton, National Oilwell Varco, KBR, Waste Management, Baker Hughes, Apache, CenterPoint Energy, Kinder Morgan, Calpine, Enbridge Energy Partners, Cameron International, EOG Resources, Spectra Energy, El

Paso, Group 1 Automotive, FMC Technologies, Frontier Oil, and Targa Resources are fortune 500 companies headquartered in Houston, TX.

9. The EEOC does not protect from discrimination on grounds such as educational institution.
10. Civil rights have been violated due to discrimination on grounds of educational institution.
11. The Ninth Amendment to the United States Constitution grants unenumerated rights and it is implied that discrimination is not limited to race, gender, national origin, color, sexual orientation, ethnicity, religion, or disability.
12. The Ninth Amendment to the United States Constitution does not imply that a form of discrimination can be discretionary.
13. Prejudice towards educational institution in hiring and recruitment practices is a Title VII of the Civil Rights Act of 1964 for employment discrimination violation under the Ninth Amendment to the United States Constitution.

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